

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

Nashville Division

FILED

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Karen DeMoor

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Freeman Webb Company, Realtors

Brook Gipson

Bret Harris

Judith Beasley

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Karen DeMoor
Street Address	415 Rome Pike Apt 5101
City and County	Lebanon, Wilson
State and Zip Code	TN 37087
Telephone Number	6299999142
E-mail Address	demoor.kl@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Freeman Webb Company
Job or Title <i>(if known)</i>	Realtors
Street Address	3810 Bedford Ave, Suite 300
City and County	Nashville, Davidson
State and Zip Code	TN 37215
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Brook Gipson
Job or Title <i>(if known)</i>	Property Manager
Street Address	3810 Bedford Ave, Suite 300
City and County	Nashville, Davidson
State and Zip Code	TN 37215
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Bret Harris
Job or Title <i>(if known)</i>	Regional Manager
Street Address	3810 Bedford Ave, Suite 300
City and County	Nashville, Davidson
State and Zip Code	TN 37215
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Judith Beasley
Job or Title <i>(if known)</i>	Respondents Representative
Street Address	3810 Bedford Ave, Suite 300
City and County	Nashville, Davidson
State and Zip Code	TN 37215
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Civil Rights

Housing/Accommodations - Fair Housing Act (Title VII 42 U.S.C. 3601 & 3602)

Americans with Disabilities - other (42 USC 12133)

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see Plaintiff original HUD complaint, attached as Exhibit B.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Please see Plaintiffs Exhibit B for allegations wrongdoing that is ongoing. Plaintiff was homeless for 3 months, incurred motel costs when couldnt stay with friends, incurred \$400 per month for storage costs of household belongings because of Defendants wrongdoing of eviction proceedings since September 2022 with costs occuring to the present. Plaintiff had to find foster homes for pets during homelessness, had to rehome one pet due to being displaced. Plaintiff also asks for relief including punitive money damages. Because of Defendants alledged intentional wrongdoings, Plaintiff seeks to ask the Court to order total damages in the amount of \$300,000 for infliction of emotional distress, homelessness, mental anguish, plus actual costs incurred.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/13/2024

Signature of Plaintiff

Printed Name of Plaintiff


Karen DeMoor

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address